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September 27, 2019

Honorable Joseph P. Stadtmueller  
U.S. District Court – Eastern District of Wisconsin  
U.S. Courthouse  
517 E. Wisconsin Ave. Room 471  
Milwaukee, WI 53202

VIA E-FILE

Re: United States of America vs. Robert Gordon  
(Case No.: 19-CR-115)

Dear Judge Stadtmueller:

I am filing herewith Defendant Gordon's Motion To Adjourn Jury Trial with supporting Affidavit in regard to the above-captioned matter.

Thank you for your attention.

Very truly yours,

BRENNAN LAW OFFICES, L.L.C.

/s/: Patrick Cavanaugh Brennan

PATRICK CAVANAUGH BRENNAN, ESQ.  
PCB:rjs

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-CR-00115

vs.

ROBERT GORDON,

Defendant.

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**DEFENDANT GORDON'S MOTION TO ADJOURN JURY TRIAL**

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The above named defendant, Robert Gordon, by his attorneys Brennan Law Offices, L.L.C., by Attorney Patrick Cavanaugh Brennan, hereby moves the court, pursuant to Rules 12 and 47, Federal Rules of Criminal Procedure, for an Order adjourning the trial in this matter, which is currently to commence on **October 28, 2019**, for a period of approximately thirty (30) days.

In support of the instant Motion, the Defendant offers the attached Affidavit of Attorney Patrick Cavanaugh Brennan.

Dated at Milwaukee, Wisconsin this 27<sup>th</sup> day of September, 2019.

Respectfully submitted,

BRENNAN LAW OFFICES, L.L.C.  
Attorney for Defendant, Robert Gordon

/s/: Patrick Cavanaugh Brennan

Patrick Cavanaugh Brennan

State Bar No.: 1000590

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-CR-00115

vs.

ROBERT GORDON,

Defendant.

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**AFFIDAVIT OF ATTORNEY PATRICK CAVANAUGH BRENNAN IN SUPPORT  
OF DEFENDANT GORDON'S MOTION TO ADJOURN JURY TRIAL**

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Attorney Patrick Cavanaugh Brennan, having first been sworn on oath, deposes  
and states as follows:

1. I am an attorney licensed to practice law in the state of Wisconsin, and  
represent the Defendant, Robert Gordon, in the above-captioned action;
2. This prosecution was commenced by means of a Criminal Complaint which  
was filed on May 28, 2019. The matter was subsequently the subject of an  
Indictment which was filed on June 18, 2019;

3. On July 15, 2019, the parties appeared for a hearing in this Court, at which time the Jury Trial in the case was set for October 28, 2019, at 8:30 a.m.;
4. At the time the July 15, 2019 hearing took place, your affiant was in the midst of being treated for a significant, ongoing and debilitating back-related medical issue. More specifically, that issue involved both a lumbar disc herniation as well as a sacral fracture;

5. As a part of the treatment your affiant was receiving at the time the hearing took place, your affiant was taking a regimen of prescribed pain management medications, and was in a nearly constant state of extreme physical discomfort. Along with this Affidavit your affiant has attached a copy of a letter dated June 28, 2019 addressed to the Honorable Pamela Pepper which your affiant authored in regard to a different case in which he was involved at about this same time, and in which is described your affiant's then current medical situation;

6. Owing in principal part to the physical infirmity from which he was suffering at the time and the nature of the treatment which he was receiving in relation to that infirmity, at the July 15, 2019 hearing before this

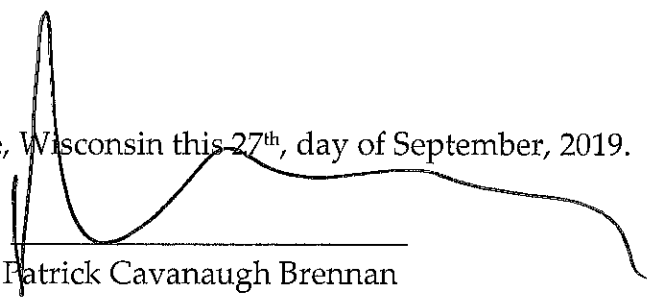
Court, your affiant failed to take note of the fact that he was already scheduled to begin a *homicide* Jury Trial in Milwaukee County Circuit Court on October 28, 2019. That case is captioned State Wisconsin v. Jacob J Paradinovich (Case No. CF-0203). That Jury Trial date had been set on **June 24, 2019;**

7. Your affiant did not become aware of this scheduling conflict until it was brought to his attention within the past two days. Your affiant then reached out to the government to make the government aware of this conflict, and to advise the government that the defense would, under the circumstances, thus be compelled to seek an adjournment of the existing trial date in this case;
8. Your Affidavit has conferred with Assistant United States Attorney Proctor in regard to this matter, and your affiant is authorized to state that the government does not oppose the Defendant's adjournment request;
9. Efforts to resolve this case short of trial are ongoing. Should those efforts prove unsuccessful, and if the Court sees fit to grant the instant adjournment request, the defense would be prepared to try this matter by the end of November;

10. This affidavit is authored in good faith and offered in support of Defendant's

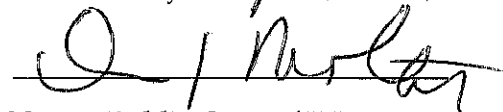
Motion to Adjourn Jury Trial in the above-captioned matter.

Dated at Milwaukee, Wisconsin this 27<sup>th</sup>, day of September, 2019.



Patrick Cavanaugh Brennan  
State Bar No. : 1000590

Subscribed and sworn before me  
this 27<sup>th</sup> day of September, 2019



Notary Public, State of Wisconsin

My commission expires: permanent

BRENNAN LAW OFFICES, L.L.C.

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June 28, 2019

Hon. Pamela Pepper  
United States Courthouse Room 222  
517 E. Wisconsin Avenue  
Milwaukee, WI 53202

VIA E-FILE

Re: United States of America v. Mays, et al.  
(Case No. 17-CR-96)

Dear Judge Pepper:

Mr. Mays' Sentencing Hearing in the above-captioned matter is currently scheduled to take place on July 2, 2019 at 9:30 a.m. in your court. However, for the reasons cited below, by means of this letter I am respectfully requesting that the Sentencing Hearing in this matter be adjourned for 45 - 60 days.

For the past several weeks, I have been consulting with a number of physicians in regard to an ongoing back-related medical issue with which I have been dealing. Those consultations are still ongoing, and will continue to take place next week.

In the meantime, based on the medications which I have been prescribed and am taking, as well as the anticipated treatment associated with this medical issue, I will not be in physical condition to proceed with the Sentencing Hearing in this case on July 2<sup>nd</sup>, as currently scheduled. It is thus my request that the Sentencing Hearing be adjourned out 45 - 60 days, at which time I expect to be in a position to go forward with the hearing.

Prior to authoring this letter I attempted to contact AUSA Kwaterski to make her aware of this request. I was unable to reach her, but left her a detailed voicemail message alerting her to the fact that this letter would be forthcoming.



Thank you for your attention. I will await the Court's response.

Very truly yours,

BRENNAN LAW OFFICES, L.L.C.

/s/: Patrick Cavanaugh Brennan

PATRICK CAVANAUGH BRENNAN, ESQ.

PCB:tjh